

REMARKS

The Office action mailed on 14 August 2003 (Paper No. 7) has been carefully considered.

The specification and Abstract are being amended to correct minor errors and improve form. Claim 3 is being canceled without prejudice or disclaimer, and claims 1, 2 and 4 thru 20 are being amended. Thus, claims 1, 2 and 4 thru 20 are pending in the application.

In paragraph 2 of the Office action, the Examiner rejected claims 12 thru 19 under 35 U.S.C. §112 (second paragraph) for lack of antecedent basis. The claims are being amended to provide proper antecedent basis, and thus the rejection should no longer apply.

In paragraph 4 of the Office action, the Examiner rejected claims 1 thru 3, 8 thru 11 and 20 under 35 U.S.C. §102 for alleged anticipation by Jung, U.S. Patent No. 6,456,341. In paragraph 5 of the Office action, the Examiner rejected claims 1 thru 3, 7, 8 and 10 thru 12 under 35 U.S.C. §102 for alleged anticipation by Takezawa *et al.*, U.S. Patent No. 6,130,497. In paragraph 7 of the Office action, the Examiner rejected claims 9, 13, 18 and 19 under 35 U.S.C. §103 for alleged unpatentability over Takezawa *et al.* '497. In paragraph 8 of the Office action, claims 4 thru 6 are objected to for dependency

upon the rejected base claim, but the Examiner stated that these claims would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. For the reasons stated below, it is submitted that the invention recited in the claims, as now amended, is distinguishable from the prior art cited by the Examiner so as to preclude rejection under 35 U.S.C. §102 or §103.

Independent claim 1 is being amended to include the recitations of dependent claim 3, which is being canceled. Thus, claim 1 now recites that the oilpack comprises a sealed space (83, 183 in Figures 4 and 7 of the application), a pack holder (90, 190) disposed between the sealed space (83, 183) and the cooling liquid pouring inlet (91, 191) and having a through hole (91, 191) communicating with both the sealed space (83, 183) and the cooling liquid receptacle (71) of the coupler (70), and oilpack coupling means (92-97 in Figure 5) formed on the pack holder (90) for coupling the pack holder (90) to the cooling liquid pouring inlet (91, 191).

Independent claim 8, as amended, recites a pack unit which includes a pack, a pack holder disposed between the pack and an inlet, and a through hole formed inside the pack holder, with characteristics and functions similar to those recited in independent claim 1.

Independent claim 20, as amended, recites the CRT assembly as including the combination of a pack, a pack holder disposed between the pack and the coupler, and a

through hole formed on first and second ends of the pack holder for communicating with both a receptacle in the coupler and the interior of a second portion of the pack.

In applying Jung '341 under 35 U.S.C. §102, the Examiner characterizes oil cap 80 (Figure 6) as an "oil pack", oil cap holder 85 as a "pack holder", air hole 87 as a "through hole", and sealing portion 81 as "coupling means" (*see* page 3, lines 11-16; page 4, lines 3-8; page 5, lines 1-6; and page 7, lines 7-12; in the Office action). However, those elements do not meet the claim recitations.

① Specifically, the "oilpack" 80 of Jung '341 does not have a "sealed space" since hole 87 is an air hole. The "pack holder" 85 of Jung '341 is not "disposed between said sealed space and said cooling liquid pouring inlet" as recited in claim 1 because, in Jung '341 (Figure 6), the "pack holder" 85 is located on one side of "oil pack" 80, and the inlet or coolant injection hole 72 is located on the other or opposite side of "oil pack" 80. Thus, the "pack holder" 85 of Jung '341 does not have "a through hole communicating with both said sealed space and said cooling liquid receptacle of said coupler" as recited in claim 1. Finally, the "oilpack coupling means" of Jung '341 is not "formed on said pack holder" as claimed; rather, the sealing portion 81 is formed on "oilpack" 80 rather than "oilpack holder" 85.

The same argument applies to independent claims 8 and 20, as amended. In claim

8, the pack unit is recited as comprising a pack, a pack holder and a through hole, with the pack holder being disposed between the pack and the inlet formed on the coupler, and with the through hole being formed inside the pack holder for communicating with both the pack and the receptacle. In claim 20, the CRT assembly is recited as including a pack, a pack holder and a through hole, with the pack holder being disposed between the pack and the coupler, and with the through hole being formed on the pack holder for communication with both the receptacle and an interior of a sealed portion of the pack.

In the Office action, the Examiner characterizes Takezawa *et al.* '497 as disclosing (in Figure 7) an oilpack (diaphragm 51), an oilpack holder (lens fixing plate 50), and an oilpack coupling means (sealing screw 54). However, the same arguments presented above relative to Jung '341 apply to Takezawa *et al.* '497.

② That is, the lens fixing plate 50 of Takezawa *et al.* '497 is not disclosed as having a through hole, whereas the oilpack holder of the invention is recited as having a through hole for communication with both the receptacle and the sealed portion or sealed space of the oilpack. Furthermore, the lens fixing plate 50 is not disposed between a sealed space and a liquid pouring inlet, as also claimed. Finally, in Takezawa *et al.* '497, the "oilpack coupling means" (sealing screw 54) is not "formed on said pack holder" (lens fixing plate 50) as claimed; in fact, as seen in Figure 7, the sealing screw 54 and lens fixing plate 50 are located on respective opposite sides of final lens 45 and cooling liquid 46 so that one

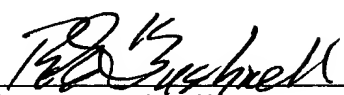
could not be formed on the other.

To summarize, neither Jung '341 nor Takezawa *et al.* '497 discloses or suggests the CRT assembly recited in amended independent claims 1, 8 and 20 of this application. In fact, the respective arrangements of the two cited patents are so different from the CRT assembly claimed herein that one of ordinary skill in the art, upon reviewing one or both references as of the date of invention, would not receive any instruction or motivation to modify the disclosures of the references in any effort to develop the claimed invention. Thus, rejections under 35 U.S.C. §102 and §103 are both inappropriate.

In view of the above, it is submitted that the claims of this application are in condition for allowance, and early issuance thereof is solicited. Should any questions remain unresolved, the Examiner is requested to telephone Applicant's attorney.

No fee is incurred by this Amendment.

Respectfully submitted,



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